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Attorneys for Defendant
SANYA GAOSHENG INVESTMENT
COMPANY, LTD.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STEELMAN PARTNERS, a Nevada limited
liability partnership,

Plaintiff,

vs.

SANYA GAOSHENG INVESTMENT
COMPANY LTD., a Hong Kong corporation,

Defendant.

Case No. 2:09-CV-1016-ECR-(GWF)

JOINT MOTION AND ~~PROPOSED~~
ORDER TO STAY ACTION PENDING
SETTLEMENT DISCUSSIONS AND
MEDIATION

(Second Request)

Plaintiff Steelman Partners (“Plaintiff”) and Defendant Sanya Gaosheng Investment Company Ltd. (“Defendant”), by and through their attorneys of record, jointly move the Court to stay this action for an additional period of thirty (30) days so they can continue to pursue good-faith settlement negotiations and a mediation of their dispute.

On March 24, 2011, this Court granted the parties’ joint request to stay this action. As part of that order, the Court indicated that granting of any further requests for stay would depend on the parties demonstrating that they diligently pursued settlement within the period of the initial stay.

Subsequent to the Court’s order, the parties diligently pursued settlement negotiations. As part of these negotiations, the parties exchanged a series of letters that extensively addressed the merits of the claims and damages sought. Through this correspondence, the parties have made progress toward reaching a settlement of this action.

However, due to the parties’ schedules and that of their respective counsel, as well as the

1 fact that this is an international dispute involving parties who speak different languages, progress
2 has been much slower than expected. Nevertheless, the parties believe that an additional thirty-
3 day stay of this action to allow settlement negotiations to continue would be beneficial and may
4 result in the settlement of this case.

5 Accordingly, the parties jointly request that the Court enter an order staying this action for
6 an additional thirty (30) days.

7 Dated: this 27th day of May, 2011.

8 Respectfully submitted,

9 By: /s/ Jonathan W. Fountain

By: /s/ James E. Dallner

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18 **IT IS SO ORDERED:**

19
20 
GEORGE FOLEY, JR.

21 United States Magistrate Judge

22 Date: May 31, 2011